



S P I R E L A W

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Via Electronic Filing

The Honorable James R. Cho
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

March 23, 2023

**Re.: *Ivanova v. Advanced Rehabilitation P.C. et al* (1:22-cv-03650)
Request to Reschedule Settlement Conference**

Dear Judge Cho:

This law firm represents Defendants, Advanced Rehabilitation P.C., Nathan Management, Corp., Julia Sapoff, and Eugene Seldin, in the above-referenced matter. The undersigned counsel files this unopposed letter motion on behalf of defendants Advanced Rehabilitation P.C., Eugene Seldin, Nathan Management Corp., and Julia Sapoff ("Defendants") on consent respectfully requesting the Court reschedule the Settlement Conference from March 30, 2023 to a date convenient to the Court.

The Settlement Conference is presently scheduled for Thursday, March 30, 2023. Due to the nature of Defendant Nathan Management's regular workload and its interaction with its clients conducting a settlement conference on a Tuesday or Thursday of any given work week is more difficult to accommodate the absence of its principal. Scheduling the Settlement on a Monday, Wednesday, or Friday of a given week affords substantially more flexibility to Defendant to meet its business needs and enhances Defendants' ability to better focus on resolving the matter at the Settlement Conference.

The Parties have discussed rescheduling the Settlement Conference and are amenable, subject to the Court's availability, to proceed on one of the following days:

April 19, 2023
April 24, 2023
April 26, 2023
April 28, 2023

This request is not intended for delay and would promote the most efficient use of the Court's and Parties' resources.



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Plaintiff consents to an extension of the stay of the case to allow the parties to devote their energies to potentially resolving this matter. We thank the Court for its attention to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ian E. Smith', is placed over a light gray rectangular background.

Ian E. Smith, Esq.
Partner, Spire Law, LLC

cc: Honorable Carol Bagley Amon

VIA ECF: All Counsel